

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LARRY GRIBLER, suing both individually and
as controlling shareholder of THREE AMIGOS SJL,
INC. d/b/a CHEETAHS GENTLEMEN'S CLUB,

07 Civ. 11436 (nrb)

Plaintiff,

-against-

SHIRELL WEISBLAT, aka SHRIELL
WEISBLAT, CHARLES WEISBLAT,
CHARLIE CASANOVA, INC.,
SEЛИM ZHERKA, STEVE ASLAND,
and MEHLER & BUSCEMI,

REPLY

Defendants.

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Plaintiffs LARRY GRIBLER and THREE AMIGOS SJL, INC. d/b/a CHEETAHS
GENTLEMEN'S CLUB, by and through their attorneys, the Law Offices of Paul J. Giacomo,
Jr., as and for their Reply to the Answer with Counterclaims of Defendants SHIRELL
WEISBLAT, aka SHRIELL WEISBLAT, CHARLES WEISBLAT, CHARLIE CASANOVA,
INC., SELIM ZHERKA, and STEVE ASLAND, hereby allege as follows:

1. Deny the allegations set forth in Paragraph 18 of the Answer with Counterclaims,
except admit that the Plaintiff had a business interaction with Charles Weisblat regarding
Plaintiff's investment in a Gentleman's Club, and refer the Court to the Complaint and the
exhibits annexed thereto for a truthful rendition of the negotiations that Plaintiff had with Charles
Weisblat, as well as the intentional wrongful conduct of Charles Weisblat in connection with the
transactions described in the Complaint.

2. Deny the allegations contained in Paragraph 19 of the Answer with
Counterclaims, except refer the Court to the Complaint and the exhibits annexed thereto for a

truthful rendition of the negotiations that Plaintiff had with Charles Weisblat, as well as the intentional wrongful conduct of Charles Weisblat in connection with the transactions described in the Complaint.

3. Deny the allegations set forth in Paragraph 20 of the Answer with Counterclaims, except refer the Court to the Complaint and the exhibits annexed thereto for a truthful rendition of the negotiations that Plaintiff had with Charles Weisblat, as well as the intentional wrongful conduct of Charles Weisblat in connection with the transactions described in the Complaint.

4. Deny the allegations set forth in Paragraph 21 of the Answer with Counterclaims.

5. Deny the allegations set forth in Paragraph 22 of the Answer with Counterclaims, except refer the Court to the Complaint and the exhibits annexed thereto for a truthful rendition of the facts surrounding these transactions, as well as the intentional wrongful conduct of the Defendants in attempting to steal away an interest in Three Amigos SJL, Inc. from the Plaintiff by fraudulent means and wrongfully attempting to transfer a portion of that interest to the Defendant Selim Zherka.

6. Deny the allegations set forth in Paragraph 23 of the Answer with Counterclaims, except refer the Court to the Complaint and the exhibits annexed thereto for a truthful rendition of the facts surrounding these transactions, as well as the intentional wrongful conduct of the Defendants in attempting to steal away an interest in Three Amigos SJL, Inc. from the Plaintiff by fraudulent means and wrongfully attempting to transfer a portion of that interest to the Defendant Selim Zherka and except to admit that the Plaintiff when he discovered the Defendants fraud acted to protect his ownership interest in Three Amigos SJL, Inc. and successfully defended that corporation and its property from an attempted forced takeover by one or more of the Defendants.

7. Deny the allegations set forth in Paragraph 24 of the Answer with Counterclaims.
8. Repeat and reallege each and every response set forth herein with respect to paragraphs 1-24 repeated and realleged in Paragraph 25 of the Answer with Counterclaims.
9. Deny the allegations set forth in Paragraph 26 of the Answer with Counterclaims.
10. Repeat and reallege each and every response set forth herein with respect to paragraphs 1-24 repeated and realleged in Paragraph 27 of the Answer with Counterclaims.
11. Deny the allegations set forth in Paragraph 28 of the Answer with Counterclaims.

FIRST AFFIRMATIVE DEFENSE

12. The First and Third Counterclaims are barred by the Statute of Frauds.

SECOND AFFIRMATIVE DEFENSE

13. Each of the three Counterclaims is barred by the equitable doctrine of unclean hands.

THIRD AFFIRMATIVE DEFENSE

14. Each of the three Counterclaims is barred by the doctrine of estoppel.

WHEREFORE, Plaintiffs respectfully pray for judgment and relief as follows:

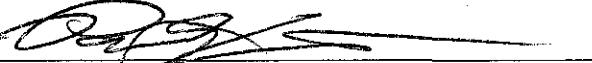
- 1) Dismissal of the Counterclaims in their entirety;

Together with the costs and disbursements associated with the prosecution of this action and the defense of the Counterclaims including attorney's fees incurred and such other and further relief as the Court deems just and proper under the circumstances.

Dated: New York, New York
February 7, 2008

Yours, etc.

LAW OFFICES OF PAUL J. GIACOMO, JR.


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